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Change Notice Number TPA-CN- 0713	TPA CHANGE NOTICE FORM	Date: 04/19/2016	
Document Number, Title, and Revision:  DOE/RL-2005-67 Surveillance and Maintenance Plan for the 105-H  Reactor Safe Storage Enclosure		Date Document Last Issued: October 2005	
Originator: Boyd Hathaway, DO	Phone: 376-4264		

Description of Change:

The referenced surveillance and maintenance (S&M) plan identifies requirements for monitoring the internal temperature and flood sensors of the safe storage enclosures (SSE) Section 2.4.2, and performance of internal inspections of the safe storage enclosures (SSE) at 5-year intervals and allow for change in the inspection interval based on completed inspections (Section 2.3).

This change notice will eliminate the internal monitoring task and change the 5-year interval to a 10-year interval with the next inspection period for all SSEs in 2025. Redline changes are attached.

Boyd Hathaway and Ecology agree that the proposed change DOE Lead Regulatory Agency

modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, Documentation and Records, and not Chapter 12.0, Changes to the Agreement. The following change is authorized:

In the referenced surveillance and maintenance plan, the requirements for remote internal temperature and flood sensor monitoring is eliminated (Section 2.4.2) and the Periodic inspection period is changed from 5 years to 10 years (Section 2.3)

## Note: Include affected page number(s)

## Justification and impacts of Change:

### Eliminate Monitoring:

HNF-59342, Surveillance Report for of 105-C, 105-D, 105-F, 105-H and 105-N/109-N Safe Storage Enclosures provides temperature and flood condition data for all SSEs, including 105-H, since 2009. The data demonstrate that the interior temperature sensors accurately reflect the exterior ambient air temperature (i.e., cooler in the winter months and warmer in the summer months). Similarly, there is no indication that a flooding event has occurred: as evidenced by the fact that no flood sensors have been alarmed and no water accumulation was found on the floors during the recent interior inspections. A flooding event is not likely to occur due to the low annual rainfall and the depth to groundwater.

The empirical data collected to date demonstrate that the interior conditions (temperature variation and no demonstrated flooding) of the SSEs are stable. Continued monitoring does not add value to the ongoing surveillance and maintenance operations.

The sensor equipment will be de-energized and left in place, however, it will not be regularly serviced or monitored. The cellular service to each SSE will be discontinued.

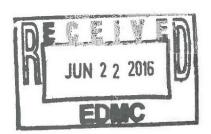
Annual exterior inspections will continue along with the periodic interior inspections to assess the structural and radiological conditions of the SSE.

## Revise Inspection schedule:

In FY 2015, RL completed the 5-year inspection of 105-C, 105-D, 105-F, 105-H, and 105N/109N SSEs. Work on 105-DR was completed in 2013. The results of the FY 2015 inspections of 105-C, D, F, H, and N are provided in HNF-59342, Surveillance Report for of 105-C, 105-D, 105-F, 105-H and 105-N/109-N Safe Storage Enclosures. Based on the findings of these recent assessments, the SSE structures, including 105-H, are holding up well to the elements and minimal repairs have been needed to date. Where maintenance or



TRI-PARTY AGREEMENT						
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housekeeping actions	have been recommended,	the actions have bee	n or	will be completed by		
RL.						
An exterior condition assessment of all SSEs, including 105-H, and exterior radiological conditions will continue to be completed annually. The combination of annual exterior inspections and 10-year interior assessment/repair cycle is adequate to maintain protectiveness of human health and the environment.						
Continued						
Approvals:  Boy 2 119  DOE Project Manager  Boyd Hathaway	Foreset	G NT 16	OR A	Approved [] Disapproved		
			[] A	Approved [] Disapproved		
Ecology Project Manager Stephanie Schleif	(105-D, DR, H, N)	Date  Le   20 110  Date	gK.	Approved [] Disapproved		



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alternating layers of Masonite, and steel on the four sides and top. The by 12.2 m [46 by 46 by 40 ft]) resis on a massive concrete foundation. graphite-moderated pile enclosed in a cast-iron thermal shield, a biological shield consisting of The reactor block is located near the center of the building. The reactor consists of a and steel on the four sides and top. The entire block (14 by 14 resis on a massive concrete foundation.

# SURVEILLANCE AND MAINTENANCE

Instructions. The Washington Closure Hanford (WCH) Field Support group provides fouring maintenance, when required. Maintenance activities are implemented in accordance with the ERC Maintenance Implementation Flora (BEI 2010). Maintenance." Field work instructions are defined in WCH-FS-02, Vol. 1, Field Support Work planned surveillance routes are shown in Figures 2-1 through 2-8. Surveillance requirements are defined in WCH-PS-01, Vol. 1, Field Support Administration, Procedure 3.1, "Scheduled" of the facility and that any hazardone material within the confinement is maintained. The The primary activity for 105-H SSE is periodic facility surveillance to ensure structural integracy

monitoring equipment of the facility. inspection history. Nomoutine activities may include necessary repair work on installed surveillances of the accessible internal meas of the SSE at 54-car intervals has been included verify facility status. The surveillance frequency may later be adjusted, based on actual The 105-H SSE was designed to be a minimal maintenance before. A provision for periodic

Prior to accessing any existing roof area within the SSE, requirements for fall protection evaluation and authorization must be me. The existing building roofs over the "C" and "D" elevator machinery rooms have open holes used for equipment removal, and access shall require fall protection (see Figure 2-8). The existing building roof over the "front face" room has experienced against deterporation and should not be accessed (see Figure 2-7). The handwalk on the upper-level short above the "C" and "D" elevator roofs are posted, stating that fall protection is required prior to access to the roofs below. The handwalk above, the front face roof is posted, stating no access to the roof below. Access to the existing building roofs is not part of the normal surveillance and inspection rouse.

inspection of the roof can be performed from grade because any potential degradation will be readily apparent (e.g., flashing coming loose). An external visual inspection of the 105 H SSE roof (e.g., footing, siding, and flashing) and building structure is conducted annually: in accordance with WCH-FS-01, Vol. 1. Procedure 3.1 Access to the most is not required and should be avoided unless repair is necessary. Visual 3-1 1

structural components, and removal of hazardous substances. integrity, barriers and posting, radiological surveys, repair of weather protection systems and final decommissioning. Planned S&M activities will include the following areas: structural the following subsections The 105-H SSE is a deactivated facility and is expected to remain in the S&M program until These activities are addressed in

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fail during earty. visitors must carry a spare light source that can be used for egress if the lighting system should lower, grade, upper levels, and the stairwells. In the interest of safety, all facility personnel and The 105-H SSE has permanent lighting installed along the surveillance route located on the

route and in the SSE access room. Additional receptacles are located on the 12-ft. 42-ft 5-m, 59-ft 4-in., and 80-ft 5 /2-in. levels. lower manuscrit room. Beveral repeptacles are located at the O-R level along the surveillance The 110-VAC receptacles are located at below grade 1 and below grade 2 passages lending to the 23 ft 4 in,

2.42 Instrumentation Sec 7 revision.

west side of the reactor, near the west stairwell. Temperature sensors are also located at the 80-ft 51, in, level near the west wall, and near the center of the artic space. The flociling sensors are located at the west side of the below grade 2 level, near the stairwell. The 105-H SSH is configured with two sets of temperature sensors (registance tempe include installed spares for each sensor. Temperature sensors are located at grade level on the detectors (Figures 2-1 and 2-8)) and a set of flooding sensors (float switch (Figure

the remote monitoring station, the system is portable and can be relocated if required. the emote monitoring station, personnel will evaluate the alarm and, if required, Signals are transmitted (via wireless modern) and monitored at the operation supervisor's H Readon and take appropriate corrective actions. Due to the need for changes in the location of The remote sensors are controlled through a programmable logic controller powered from DP-1. which is currently, boated in the 1112 N Building. When an alarm is observed at OF OF THEM

sensors can be electrically switched from the workstation at the 1112-N Building to the backup conducted during regularly scheduled surveillance periods. oan be menually switched to previously installed spares, from the SSE white room, climinating operating power. In the event of an instrument failure, monitoring for the temperature sensors the programmable logic controller. The temperature-monitoring circuits operate on a 4- to will result in a flooding alarm at the monitoring station. The flooding circuit is directly wired to monitoring station. The flooding sensor is normally closed carcuit, so a loss of configuity sailors the need to make a special entry into the SSB. 20-mile carrent loop from transmitters. A loss of continuity to a resistance temperature detector will result in a loss of signal to the The transmitters are supplied with 120-VAC for Instrument replacements will mornally be In addition, the rectime

## 2.4.3 Ventilation

placing the facility into ISS. Remaining equipment and components that contain radiological interior of the building have had a fixative applied to limit the spread of contamination. The 105-H SSH is a deactivated facility that is uninhabited and backed, except during S&N inventory were scaled during implementation of the ISS project. Many accessible areas in the Many of the reactor's components were removed as part of the stabilization effort for

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## TPA Change Notice (TPA-CN 0713)

Revised language to DOE/RL-2005-67, Surveillance and Maintenance Plan for the 105-H Reactor Safe Storage Enclosure

## Insert A as new Paragraph - Section 2.3 Surveillance and Maintenance (DOE/RL-2005-67 Page 2-2)

The regulatory agencies, EPA and Department of Ecology, will be notified and invited to attend annual inspections and ten year surveillance inspections. To support the internal surveillances every 10 years, DOE will submit a report to Ecology and the administrative record documenting all issues and concerns, including the checklists for the past 10 year annual inspections.

## Item B - Section 2.4.2 Instrumentation (DOE/RL-2005-67 Page 2-13)

In 2009, the analog cellular system was replaced with a digital system and continuous monitoring was converted to periodic monitoring once per month. Signals were transmitted to remote laptop computer instead of the supervisors work station located in the 1112-N building.

In 2016, the digital telephone modern that allows remote computer access to the monitoring instrumentation will be disconnected in accordance with TPA Change Notice 0713. The interior equipment including sensors and wiring will remain in place, however, the equipment will not be maintained. If required in the future, the telephone modern connection may be reestablished.